

AO 91 United States District Court  
Southern District of Texas  
FILED

DEC 31 2019 UNITED STATES DISTRICT COURT

David J. Bradley, Clerk

for the  
Southern District of Texas

United States of America  
v.  
JONATHAN ONTONIEL GOMEZ-ALFARO  
YOB: 1996 CITIZENSHIP: HONDURAS

Case No.

M-19- 3188 -M

Defendant(s)

### CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 17 - December 30, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

8 U.S.C. 1324(a)(1)(A)(ii)

*Offense Description*

Knowingly and reckless disregard of the fact that J.I.G.G., a citizen of Honduras, who had entered the United States in violation of law, did knowingly transport, move, or attempt to transport by foot, said alien in furtherance of such violation of law within the United States, that is from a location near Hidalgo, Texas to another location near Hidalgo, Texas.

This criminal complaint is based on these facts:

See Attached Affidavit


☐ Continued on the attached sheet.


Approved by Robert Guerra  
AUSA

Sworn to before me and signed in my presence.

Date: 12/31/2019 - 3:18pm

City and state: McAllen, Texas

  
Complainant's signature  
HSI Special Agent Scott Przekop  
Printed name and title

  
Judge's signature  
Juan F. Alanis, U.S. Magistrate Judge  
Printed name and title

### AFFIDAVIT IN SUPPORT

On December 17, 2019, Border Patrol Agents encountered a male subject, later identified as Jonathan Ontoniél GOMEZ-Alfaro, and a juvenile, later identified as J.I.G.G., after both individuals illegally crossed the Rio Grande River near Hidalgo, Texas. GOMEZ-Alfaro claimed to be traveling with J.I.G.G. GOMEZ-Alfaro claimed that J.I.G.G. was his juvenile son and provided documentation to support that claim. An immigration inspection was conducted and both individuals were found to be illegally in the United States.

At that time, GOMEZ-Alfaro was not prosecuted for 8 U.S.C. 1325 (illegal entry).

On December 30, 2019, the Honduran consulate contacted the Department of Homeland Security regarding the alleged familial relationship between GOMEZ-Alfaro and J.I.G.G. Based on this information, Homeland Security Investigations Special Agents (HSI), approached GOMEZ-Alfaro regarding his claim to be the father of J.I.G.G and requested his consent to conduct a DNA check to determine paternity. GOMEZ-Alfaro stated that he was not the actual father of J.I.G.G. as previously stated.

GOMEZ-Alfaro further stated that he was transporting the child within the United States for the purpose of using the child to be allowed to stay in the United States. GOMEZ-Alfaro implied he knew the child was illegally in the United States and intended to further the child's illegal entry and presence within the United States.